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1469 '99 SEP -8 A10:15

August 20th, 1999

This is a response to the FDA's invitation for public comment on the July 6th proposal on the labeling and refrigeration of shell eggs (docket nos: 98N-1230; 96P-0418; 97P-0197). I am writing on behalf of Compassionate Action for Animals, a Minneapolis group which promotes veganism and animal rights by outreach to the community based on principles of education and nonviolence.

According to the specified FDA proposal, the ideal solution to this public health problem [salmonellosis] would be to adopt measures to eliminate viable SE in shell eggs through preventing transovarian and trans-shell contamination. However, the actions proposed in this document, which include requiring safe handling labels on packages of eggs and mandatory refrigeration of eggs below a certain temperature by retail establishments, neither coincide with your ideal standards of prevention nor do anything to eradicate this dangerous bacteria from the eggs before they leave the laying facilities. What you propose is nothing more than an unreliable band-aid solution to a problem that you admit is a serious health concern.

For the FDA to make a truly viable effort towards preventing further illnesses and deaths caused by SE, it must go to the root of the problem--the diseased chickens from which these eggs come. As evidenced in your proposal, the FDA is fully aware that SE contaminates an egg either through trans-shell penetration of bacteria in the egg's environment, or by an SE infection in the hens' ovaries which results in immediate infection of the egg before it is even laid. Given this knowledge, the FDA should clearly see that to make any long-lasting progress in combating SE they must 1) improve the hens' health and sanitary conditions in an effort to prevent the trans-shell penetration of bacteria, and 2) ban the practice of forced molting of chickens, which is so stressful that it destroys the hens' immune systems, making the birds, and consequently their eggs, highly susceptible to Salmonella bacteria.

The FDA does have jurisdiction to ban forced molting, which is practiced in the egg industry solely to make a final profit off of hens whose bodies are exhausted from a lifetime of unnaturally high egg production in an environment that stresses them both mentally and physically. There is a definite, undeniable link between the forced molting of hens and the presence of SE in eggs. The FDA needs to focus on measures which would prevent the bacteria from ever entering eggs rather than consciously allowing a potentially contaminated product to be sold at stores and served at eating facilities. Is it up to the consumer to believe they aren't in danger of infection when they cook an egg in a preventative way, or is it the responsibility of the FDA to do everything within their

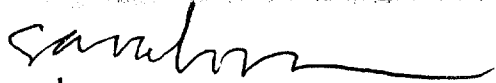
96P-0418

C470

power to ensure that potentially poisonous eggs are not made available in the first place?

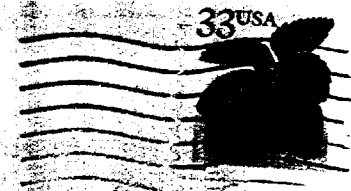
The FDA has already been petitioned in the past to ban the practice of forced molting. I ask you to grant this petition without further delay. Furthermore, I encourage you to look into the health and sanitary benefits there are for chickens who are permitted to walk, stretch their wings, and dustbathe, as the condition of the hens directly reflects the condition of the eggs with which you are concerned.

For the animals,

A handwritten signature in dark ink, appearing to read 'Sarah Moran', with a long horizontal flourish extending to the right.

sarah moran

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CROSS FILE SHEET

File Number

98N-1230 *C 470*

See File Number:

97P-0197 *C 471*

96P-0418/ *C40*